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Charles R. Spies

July 24, 2012

Anthony Herman General Counsel Federal Election Commission 999 E Street, NW Washington, DC 20463 VIA HAND DELIVERY

MUR# 6613

Re: Complaint against Prosperity for Michigan, and Jennifer Satterlee, in her official capacity as Treasurer (FEC ID#: C00518357)

Dear Mr. Herman:

On behalf of Hoekstra for Senate, we respectfully file this complaint against Prosperity for Michigan, a Clark Durant-supporting front group registered as an independent expenditure-only committee, and Jennifer Satterlee, in her official capacity as Treasurer (collectively, "PFM") for flagrant violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), and the Federal Election Commission's (the "Commission") Regulations. Specifically, PFM appears to have knowingly filed false and misleading reports with the Commission for purposes of concealing the identity of its donors.

Relevant Facts

PFM filed its Statement of Organization on April 6, 2012 and an amended Statement of Organization on April 30, 2012. On July 13, 2012, PFM filed its July Quarterly Report. In that report, PFM swore under oath that it had no financial activity from April 1, 2012 through June 30, 2012. This report reflects cash-on-hand on line 8 of the summary page as zero. Further, the report does not reflect a single contribution, disbursement or independent expenditure.

¹ See Prosperity for Michigan, July 2012 Quarterly Report, filed July 13, 2012 (attached as Exhibit A).

On July 23, 2012, PFM filed an amended July Quarterly Report. Amazingly, in its amended filing, PFM reflects total receipts on line 6(c) of the summary page of \$188,500. This total includes major contributions from nine individuals and two corporate entities.² According to the dates of these donations, PFM received all contributions prior to June 30, 2012, the end of the July reporting period. In addition, despite the fact that all nine individual contributions far exceed \$200, only two of the nine entries on Schedule A contain the required employer and occupation information.

Coincidently, on July 23, 2012, the same day it filed its amended July Quarterly Report, PFM filed an independent expenditure report³ reflecting two expenditures on July 21, 2012 to Media Ad Ventures and Sterling Consulting in amounts of \$275,000 and \$13,628, respectively. The purpose of the expanditure to Media Ad Ventures was "Tv Ad" and the purpose of the expenditure to Sterling Consulting was "Management and Strategy." Both expenditures were for the support of Clark Durant ("Durant"), a candidate for U.S. Senate in Michigan, in the upcoming August 7, 2012 primary election. The report is listed as a 48-hour report despite the fact that Michigan's August 7 primary is less than 20 days away from July 21. PFM began running a television ad supporting Durant and blasting his opponent, Pete Hoekstra, on July 21, 2012.

Applicable Luw

The filing of a false or incorrect report is a very serious violation of the Act. The Act requires that a committee report the name, address, occupation and employer of any donor who contributes, in the aggregate, in excess of \$200 per calendar year. 2 U.S.C. § 434(b)(3)(A). Furthermore, Commission regulations require a committee to make a request for occupation and employer when a contribution is solicited and require a follow-up request if such information is not provided at the time of contribution (i.e. "best efforts"). 11 CFR § 104.7.

The requirement to properly disclose information regarding donors to a committee is one of the core provisions of the Act, especially with regard to independent expenditure-only committees and their ability to accept unlimited individual and corporate contributions. It is essential to voters, candidates, reporters and political observers who monitor transparency in politics to have a proper, accurate and truthful accounting of information provided on reports filed with the Commission.

² See Prosperity for Michigan, Amended 2012 July Quarterly Report, filed July 23, 2012 (attached as Exhibit B).
³ See Prosperity for Michigan, 24/48 Hour Notice of Independent Expenditures, filed July 23, 2012 (attached as Exhibit C).

Interestingly, PFM's ad is strikingly similar to an ad paid for and sponsored by Clark Durant's official campaign committee and which began running on the same day. Both ads address the exact same topics, including allegations against Hoekstra about earmarks, raising pay, voting for bailouts and raising debt, and raising the debt ceiling. See PFM's ad at http://www.youtube.com/watch?v=Vd5g3 mkH-I&feature=youtu.be. Such marked similarities raise serious questions about coordination between PFM and Durant's official campaign.

Thus, the reporting provisions are an essential part of the campaign finance laws. The U.S. Department of Justice describes them as foliums:

A treasurer who submits information concerning contributions and expenditures to the FEC, knowing the information to be false, violated 18 U.S.C. 1001. A person involved in a transaction reportable under FECA who attempts to disguise it, or misrepresents its source, purpose or amount, "willfully causes" the treasurer of the recipient committee to furnish false information concerning transaction to the FEC in violation of 18 U.S.C. 2(b) and 1901.

In addition to its periodic reporting requirements, a political committee must file a special notice with the Commission if it makes an independent expenditure exceeding \$1,000 after the 20th day, but more than 24 hours, before the day of an election. The notice must he filed with the Commission within 24 hours after the expenditure is made. 11 CFR §§ 104.5(g)(2); 104.4(c).

Analysis

It is unconscionable to think that PFM and its Treasurer, Jennifer Satterlee were unaware of any of the committee's eleven large-donor contributions during the July Reporting period when it filed is initial July 2012 Quarterly Report. Every single one of the contributions reflected on PFM's amended July Quarterly Report was received by PFM prior to the June 30, 2012, the last day of the reporting period. It flies in the face of reality that a committee could reflect zero cash on hand and no contributions two days before a report is due, and then just ten days later reflect almost \$200,000 in contributions, stemming back to its first contribution on April 17, 2012 from "Dunigan Brothers Inc." for \$7,000. At best, PFM and Satterlee were unprepared to file PFM's July Quarterly Report, and instead reflected zero activity for the mere purpose of submitting the report by the deadline. Of course, this theory is negated by the fact that PFM filed its initial report on July 13, two days before the July 15 deadline. PFM and Satterlee would have had two whole days to acquire even marginal contributor information to provide at least the bare minimum of disclosure to the public.

Instead, all evidence points toward PFM and Satterlee intentionally reflecting a report of no activity in its initial July 13 filing in order to shield its donors' identities for ten days after the reporting deadline. In doing so, PFM was able to cast a shadow over its financial resources until it used those concealed contributions to fund and disseminate a television attack ad against Pete Hoekstra, the opponent of its favored candidate, Clark Durant. For whatever reason, PFM appears to have had an interest in concealing the true identity of its donors for as long as possible and/or hiding the fact that it had not undertaken "best efforts" to obtain the contributor information required under 2 U.S.C. § 434(b)(3)(A) and 11 CFR § 104.7. Either way, PFM and Satterlee have deliberately concealed PFM's real and true financial activities in direct

⁵ Federal Prosecution of Election Offenses, Seventh Edition (2007), p. 185.

contravention to the Act and the Commission's Regulations. In doing so, they have denied Michigan voters the disclosure and transparency to which they are entitled under the law.

It should also be noted that when PFM ultimately disclosed its eleven donors in its amended July Quarterly Report, it failed to provide the necessary employer and occupation information for seven out of the nine individual contributors, all of which donated more than \$200 to PFM.

Lastly, according to PFM's recently filed independent expenditure notice, PFM's television ad supporting Durant and attacking Hoekstra was disseminated on July 21, 2011. Michigan's primary election is scheduled for August 7, 2012. For independent expenditure reporting purposes, PFM's television ad was disseminated to the general public within 20 days before the August 7 primary. However, PFM's independent expenditure report, filed July 23, reflects the report as being a 48-hour independent expenditure report. Under 11 CFR §§ 104.5(g)(2) and 104.4(c), PFM was required to file a 24-hour independent expenditure report because its ad was disseminated within 20 days before the primary election. In failing to file this 24-hour report, PFM has not only violated the Commission's disclosure provisions, but it has once again denied Michigan voters the transparency they deserve in the run up to the August 7 primary.

Treasurer Liability

As Treasurer for PFM, Jennifer Satterlee has primary responsibility for accurately reporting PFM's receipts and disbursements to the Commission. See 2 U.S.C. § 432(c); 11 CFR §§ 102.9; 104.14(d). Consequently, if PFM has misstated its financial activity on its initial 2012 July Quarterly Report, as evidenced above, Ms. Satterlee will be primarily liable for all resulting violations of federal law. Furthermore, in January 2005, the Commission approved a policy statement regarding treasurers in enforcement proceedings. In it, the Commission explained that:

in enforcement actions where a political committee is a respondent, the committee's treasurer will typically be subject to Commission action only in his or her official capacity. However, when information indicates that a treasurer has knowingly and willfully violated the Federal Election Campaign Act (the Act), recklessly failed to fulfill duties spacifically impused by the Act or intentionally deprived himself or herself of faots giving rise to the violation, the Commission will consider the treasurer to have acted in a personal capacity and make findings accordingly.

See Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings, 70 Fed. Reg. 3 (Jan. 3, 2005).

With that said, if PFM has intentionally misstated its financial activity, which appears likely in light of the overwhelming evidence presented above, then the Commission should also find Ms. Satterlee to be personally liable for such deliberate misreporting. Knowing and willful violations of federal campaign finance laws are not taken lightly by the Commission, and if the Commission determines that there is probable eause to believe that a knowing and willful violation has occurred in this case, we request that it refer such violations to the U.S. Department of Justice for criminal prosecution. See 2 U.S.C. § 437g(a)(5)(C).

Conclusion

In light of the foregoing, we respectfully request that the Commission take steps to immediately investigate the potential knowing and willful acts outlined above by PFM and its Treasurer, Jennifer Satterlee, pursuant to 2 U.S.C. § 437g(a)(2). In doing so, the Coromission should find reason to believe PFM has violated the Act and the Commission's Regulations, determine and impose appropriate sanctions for any and all violations, and enjoin PFM from any and all violations in the future. We also ask that the Commission impose such additional remedies as are necessary and appropriate to ensure compliance, and refer this matter to the U.S. Department of Justice as necessary. The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,

Charles R. Spies

Counsel to Hoekstra for Senate

Signed and sworn before me this 24th day of July, 2012

MOTARY PUBLIC

MICHELE R. GRAY
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires January 1, 2018

Enc.

8329298.R37356444006

Exhibit A

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

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FEC Form 3X (Rev. 02/2003)	SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS	Page 2
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This committee has qualified as a multi	candidate committee. (see FEC FORM 1M)	
	For further information contact:	
	Federal Election Commission 999 E Street, NW Washington, DC 20463	
	Toll Free 800-424-9530	

Local 202-694-1100

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DETAILED SUMMARY PAGE of Receipts

	FEC Form 3X (Rev. 06/2004)	or neceipts	Page 3
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	to Federal Candidates and Other	0.00	0.00
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DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

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		-mulamangamangamagamagamagamagamagamagamagam	0.00 and any other median way of the real factor of the control of
	(ii) "Levin" Share	المناسبة المستقدية المستق	and and a color of the state of the color of
(0)	Federal Election Activity Paid Entirely	0.00 f	1 0.00
(0)	With Federal Funds		and a straight of the straight
(C)	Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
	Emiles colarin, colarin, and coler,	And the state of t	Landand bushessisters Town See Mande
i. Total	Disbursements (add Lines 21(c), 22,		
	24, 25, 26, 27, 28(d), 29 and 30(c))	0.00	0.00
		hardweller bredheder dem berther been	ما مساؤال وبيرا أبو فيها في المساود والمساود وال
2. Total	Foderal Diskussesses		
-	l Federal Disbursements	أدب المحمود مساوسة والمحاودة والمحاو	ber where she s subserved : sudar self-work specifications
from	Federal Disbursements tract Lihe 21(a)(ii) and Line 30(a)(ii)	0.00	0.00

DETAILED SUMMARY PAGE

FEC Form 3X (Rev. 02/2003)

of Disbursements

	1 CO 1 OIIII 3X (Nev. 02/2003)		raye 5
ill	. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
	Total Contributions (other than loans) (from Line 11(d), page 3)	0.00	0.00
	Total Contribution Refunds (from Line 28(d)) Net Contributions (other than loans)	0.00	0.00
5 5.	(subtract Line 34 from Line 33)	0.00	0.00
	Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))▶	0.00	0.00
	Offsets to Operating Expenditures (Iram Line 15, page 3),	0.00	0.00
38.	Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	0.00

Exhibit B

FEC FORM 3X

REPORT OF RECEIPTS **AND DISBURSEMENTS**

For Other Than An Authorized Committee

			Office Use Only	
NAME OF COMMITTEE (in full)	TYPE OR PRINT ¥	Example: If typing, type over the lines.	12FE4M5	
, Prosperity For Michiga	an			•
				
		 	<u> </u>	لسسب
ADDRESS (number and street)	201 Townsend			
•	Sie. 923			1
Check if different than previously reported. (ACC)	Lansing		MI 48933	- ; , ,
2. FEC IDENTIFICATION N	IUMBER ▼ CIT	Y A	STATE ▲ ZIP C	ODE A
C : C00518357	3. IS	THIS NEW EPORT (N) OR	AMENDED (A)	
4. TYPE OF REPORT (Choose One)	Report 3-4	20 (M2) May 20 (M5) Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
(a) Quarterly Reports:	Due On: Mar	20 (M3) Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election
tur etc.	Apr	20 (M4)	Oct 20 (M10)	Year Only) Jan 31 (YE)
April 15 Quarterly Report ((Q1) (c) 12-Day	Primary (12P)	General (12G)	Runoff (12R)
July 15 Quarterly Report (PRE-Election	Jean.	P 9	naion (icin
October 15	Report for the:	Convention (12C)	Special (12S)	
Quarterly Report (January 31 Year-End Report (Photological	u eu	in the State	3 6
July 31 Mid-Year Report (Non-electi Year Only) (MY)	POST-Election	General (30G)	Runoff (30R)	Special (305)
Termination Repor	Report for the:		In the	- Armelones A
ters (ICN)	Election	n on	State	, ,
5. Covering Period	01 2012	through 06	30 2012	1
I certify that I have examined t	this Report and to the best of	my knowledge and belief it is t	rue, correct and complete.	
Type or Print Name of Treasur	er JENNIFER SATTERLEE			
Signature of Treasurer	NNIFER SATTERLEE	[Electronically Filed]	Date 07 23	2012
NOTE: Submission of false, error	neous, or incomplete information	may subject the person signing	this Report to the penalties of 2	! U.S.C. §437g.
Office Use			FEC FO	RM 3X
FEBAN028				ليـ

	-	SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS	
_	FEC Form 3X (Rev. 02/2003)		Page 2
	Vrite or Type Committee Name		
_	Prosperity For Michigan		
R	Report Covering the Period: From:	04 01 2012 To	o: 06 30 2012
		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 2012		general general pot de form of the form of the first of the form o
	(b) Cash on Hand at Beginning of Reporting Period	ระ	
	(c) Total Receipts (from Line 19)	188500.00	188500.00
	(d) Subtotal (add Lines 6(b) and		
	6(c) for Columb A and Lines 6(a) and 6(c) for Columb B)	188500.00	188500.00
7 .	Total Disbursements (from Line 31)	0.00	0.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	188500.00	188500.00
9.	Debts and Obligations Owed TO		
	the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10.	Debts and Obligations Owed BY		
	the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
<u></u>	This committee has qualified as a multic	candidate committee. (see FEC FORM 1M) For further information contact:	
		Federal Election Commission 999 E Street, NW Washington, DC 20463	

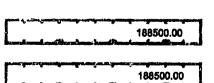
Toli Free 800-424-9530 Local 202-694-1100

FEGAN026

DETAILED SUMMARY PAGE of Receipts FEC Form 3X (Rev. 06/2004) Page 3 Write or Type Committee Name **Prosperity For Michigan** ัด""มี"_ริ ********** \$ 31 \$ 5 . \$ 2012 Report Covering the Period: 04 2012 30 From: To: **COLUMN A** COLUMN B I. Receipts **Total This Period** Calendar Year-to-Date 11. Contributions (other than loans) From: (a) Individuals/Persons Other Than Political Committees 188500.00 188500.00 (i) Itemized (use Schedule A)..... (ii) Unitemized (iii) TOTAL (add Lines 11(a)(i) and (ii)...... 0.00 0.00 (b) Political Party Committees Other Political Cummittees 0.00 0.00 (such as PACs)..... Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry 188500.00 188500.00 Totals to Line 33, page 5) 12. Transfers From Affiliated/Other 0.00 Party Committees..... 0.00 0.00 0.00 13. All Loans Received..... 0.00 0.00 14. Loan Repayments Received..... 15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) 0.00 0.00 (Carry Totals to Line 37, page 5)..... 16. Refunds of Contributions Made to Federal Candidates and Other Political Committees..... 0.00 0.00 17. Other Federal Receipts (Dividends, Interest, etc.)..... 0.00 0.00 18. Transfers from Non-Federal and Levin Funds (a) Non-Federal Account (Irom Schedule H3)..... 0.00 0.00 0.00 (b) Levin Funds (from Schedule H5) (c) Total Transfers (add 18(a) and 18(b)).. 0.00 0.00

Total Receipts (add Lines 11(d),
 12, 13, 14, 15, 16, 17, and 18(c))........

20. Total Federal Receipts
(subtract Line 18(c) from Line 19)▶



-	
	188500.00
, describe , dile e describe ,	All markets of Franchisco

188500.00

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 02/2003)

irsements

Page 4

	II. Disbursements	COLUMN A Total This Reriod	COLUMN B
1.	Operating Expenditures: (a) Allocated Federal/Non-Federal	IOIAI IIIIS PERIOD	Calendar Year-to-Date
	Activity (from Schedule H4)	s Apper of agentium of agents complements of an object of an object of	and the state of t
	(i) Federal Share	0.00	0.00 haadaadaadka sharah salkanda aka Sinad
	(II) Non-Federal Share	0.00	0.00
	(b) Other Federal Operating Expenditures	0.00	in the second of
	(c) Total Operating Expenditures	handle a stranger of the state of the self transfer as the sent	I was the west world be adversely a self vanisher with a State of
	(add 21(a)(i), (a)(ii), and (b))▶	0.00	0.00
	Transfers to Affiliated/Other Party	E-man for configurations from the machine machine to the configuration of the configuration o	i des continue antice antices attenden es de constitue antices en la constitue
	Contributions to	0.00	وروار المحاري والمروا المراجع المراجع المراجع المراجع والمراجع وال
	Federal Gandidates/Committees and Other Political Committees	0.00	0.00
	Independent Expenditures	CO.00	60.00
	Coprdinated Party Expenditurus		U.O.
	(2 U.S.C. §441a(d)) (use Schedule F)	0.00	0.00
	Loan Repayments Made	0.00	0.00
•	Lowi Hepayments WEGG	or the section of the	property of a specifical and back of and a
	Loans MadeRefunds of Contributions To:	0.00	0.00
	(a) Individuals/Persons Other Than Political Committees	0.00	0.00
	(b) Political Party Committees	0.00	0.00
	(c) Other Political Cornelities		- the state of the
	(such as PACs)	0.00	0.00
	(d) Total Contribution Refunds		American de la contraction del
	(add Lises 28(e), (b), and (c))▶	0.00	0.00
•	Other Disbursements	0.00	0.00
١.	Federal Election Activity (2 U.S.C. §431(20))		
	(a) Allocated Federal Election Activity		
	(from Schedule H6) (i) Federal Share	0.00	0.00
	•		The state of the s
	(ii) "Levin" Share	0.00	0.00
	(b) Federal Election Assivity Paid Entirely With Federal Funds	0.00	0.00
	(c) Total Federal Election Activity (add	U UU he serien ends van die zusen kannen de serien en de serien end verschen end verschen zusen de serien verschen en op en en general gewen gewen gewennig verschen end gewen verschen end verschen en op en en en en en en en e	h
	Lines 30(a)(i), 30(a)(ii) and 30(b)) ▶	0.00 mare based Francisco establica de la companya de la	0.00 المسالية عمل المسالية من المسالية عمل المسالية عمل المسالية عمل المسالية عمل المسالية عمل المسالية عمل ا
	Total Disbursements (add Lines 21(c), 22,	Landanishan kanalan dan kanalan kanalan kanalan kanal	himinaminaminaminaminaminaminaminaminamin
	23, 24, 25, 26, 27, 28(d), 29 and 30(c))	0.00	0.00
	Total Fedëral Discorpaments		
	(subtract Line 21(a)(ii) and Line 30(a)(ii)	en temberetunden den dem dem dem dem dem dem	Andrew State of the State of th
	from Line 31)	0.00	0.00

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Ex-	COLUMN A	COLUMN B
penditures	Total This Period	Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	1 188500.00	grand gard against angus a 188500.00 Angus alkan angus a
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	188500.00	188500.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))▶	hannalen ender sering er denning i attentition of mendemental and an er	gramming in hings a stript methylaming transmity makeys i stript manys and private 0,000
37. Offsets to Operating Expenditures (from Line 15, page 3)	6.00 see a s	Succeeding of the color of the substitute of the
38. Net Operating Expenditures (subtract Line 37 from Line 36)	Free Lee 1 of 10 or 2 or more sound as Alexander and Marie of the 10 or	has not as the self of the sel

SCHEDILLE A (FEC Form 3X)

SCHEDULE A (FEC FORM 3X)	Lies constructed asherivitates	FOR LINE NUMBER: PAGE 6 OF 9
ITEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	(check only one) X 11a
Any information copied from such Reports and Str or for commercial purposes, other than using the	atements may not be sold or used by any pename and address of any political committee	erson for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full) Prosperity For Michigan		
Full Name (Last, First, Middle Initial) A, Stepthen Brownell		Date of Receipt
Mailing Address 306 Provencial Rd		05 23 2012
City Gross Pointe	State Zip Code MI 48236	Transaction ID : SA11AI.4143 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	15000.00
Name of Employer	Occupation	
Receipt For: Primary General Other (specify)	Aggregate Year-to-Date 15000.00	
Full Name (Last, First, Middle Initial) B. Daniel Carroll		Date of Receipt
Mailing Address 671 Orchard Ridge Rd	05 16 2012	
City Bloomfield	State Zip Code MI 48304	Transaction ID : SATIAL4141 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	Comment of the second s	Princing of Each Medalit and Security of S
Name of Employer	Occupation	
Receipt For: Primary General	Aggregate Year-to-Date ▼	-
Other (specify)	62500,00	
Full Name (Last, First, Middle Initial) C. Dunigan Brothers Inc.		Date of Receipt
Malling Address		04 17 2012
City Jackson	State Zip Code MI 49203	Transaction ID : SA11Al.4142 Amount of Each Receipt this Period
FEC ID number of contributing federal political earnmittee.		7000.00
Name of Employer	Occupation	7
Receipt For: Primary General Other (specify)	Aggregate Year-to-Date ▼ 7000.00	
SUBTOTAL of Receipts This Page (optional)	•	
TOTAL This Period (last page this line number o	nly)	. I was to see the second section of

SCHEDULE A (FEC Form 3X)

ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the	(check only one)
		Detailed Semmary Page	X 11a 11b 11c 12 13 14 15 18 17
Any information copied from such Reports and Sta or for commercial purposes, other than using the r	rson for the purpose of soliciting contributions to solicit contributions fram_such_committee.		
NAME OF COMMITTEE (In Full) Prosperity For Michigan			
Full Name (Last, First, Middle Initial) A. JM Jung			Date of Receipt
Mailing Adoress Z677 W 12 Mile Rd			· · · · · · · · · · · · · · · · · · ·
City Southfield	State MI	Zip Code 48034	Transaction ID : SA11Al.4140 Amount of Each Receipt this Period
FEC ID number of contributing		na nan igirang in ingana angari angarina nahinan ikini ma hangahanan kalamahan an	25000.00
Name of Employer Self	Occupation Executive		
Recoipt For: Primary General Other (specify)	Aggregate	Year-to-Date ▼ 25000.00 33	
Full Name (Last, First, Middle Initial) B. Patrick Kerzic			Date of Receipt
Mailing Address 1 Elmsleigh Lnn			06 26 2012
City Gross Pointe	State Mi	Zip Code 48230	Transaction ID : SA11Al.4149 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C .	-	15000.00
Name of Employer	Occupation	i	1
Receipt For: Primary General Other (specify) ▼	Aggregate	Year-to-Date ▼ 15000.00	
Full Name (Last, First, Middle Initial) C. Robert Liggett Jr.			Date of Receipt
Mailing Address 625 Lake Shore Rd		71. 0	06 14 2012
City Gross Pointe Shores	State Mi	Zip Code 48236	Transaction ID : SA11AI.4145 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	adversation and market adversations of	15000.00
Name of Employer	Occupation	,	1
self Receipt For:	Aggregate	Year-to-Date ▼	†
Primary General Other (specify) by		15000.00	
SUBTOTAL of Receipts This Page (optional)			55000.00
TOTAL This Period (last page this lime number of	nly)		grate Suntition Bearing Franchischer der select

SCHEDULE A (FEC Form 3X)

SCHEDULE A (FEC Form 3X) TEMIZED RECEIPTS		Use separate schedule(s) for each callegory of the Detailed Semmary Page	FOR LINE NUMBER: PAGE 8 OF 9 (check only one)
		Darming Canmary Lage	13 14 15 16 17
Any information copied from such Reports and S or for commercial purposes, other than using the	tatements ma	ay not be sold or used by any pe	rson for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full) Prosperity For Michigan	nerge etti.d	massaur. ajiy, ponucas consimuas	torgonet Country works needs Super Levinnings.
Full Name (Last, First, Middle Initial) A. Joseph F Luther			Date of Receipt
Mailing Address 25872 Cheyenne Dr City	State	Zip Code	06 26 2012
Novi	MI	48374	Transaction ID : SA11AI.4148 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C .	The state of the separate processing of the state of the	The state of the s
Name of Employer	Occupation		
Receipt For: Primary General Other (specify) ▼	· · · · · · · · · · · · · · · · · · ·	Year-to-Date ▼ 10000.00	
Full Name (Last, First, Middle Initial) B. Midwest Steel	······································		Date of Receipt
Mailing Address 2525 E Grand Blvd			06 26 2012
City Detroit	State Mi	Zip Code 48211	Transaction ID : SA11Al.4151 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C		9500.00
Name of Employer	Occupation	1	
Receipt For: Primary General Other (specify)	Aggregate	Year-to-Date ▼ 9500,00	
Full Name (Last, First, Middle Initial) C. Leslie Rose	·· <u>·</u>		Date of Receipt
Mailing Address 300 S. Ocean Blvd Apt 3B			Q6 24 2012
City Palm Beach	State FL	Zip Code 33480	Transaction ID : SA11Ai.4144 Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	ning commission of the state of	3000.00
Name of Employer	Occupation	· · · · · · · · · · · · · · · · · · ·	
Receipt For: Primary General Other (specify) ar	Aggregate	Year-to-Date ▼ 3000.00	
SUBTOTAL of Receipts This Page (optional)			22500.00
TOTAL This Period (last page this line number	only)		According to the second of the

SCHEDULE A /EEC Form 3Y

SCHEDULE A (FEC FORM 3X)	Use separate schedule(s)	FOR LINE NUMBER: PAGE 9 OF 9
ITEMIZED RECEIPTS	for each caregory of the Detailed Surrenary Page	(check only one) X 11a
Any information copied from such Reports and Statem or for commercial purposes, other than using the name		rson for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full) Prosperity For Michigan		
Plymouth FEC ID number of contributing federal political committee. Name of Employer Octor Receipt For: Primary General Other (specify)	State Zip Code MI 48170 cupation gregate Year-to-Date ▼	Date of Receipt 06 Z5 2012 Transaction ID : SA11AI.4147 Amount of Each Receipt this Period 25000.00
Full Name (Last, First, Middle Initial) B. Joseph Thorrez Mailing Address 2080 South Shore Dr.	e Argo dinar Provi alagan la mas Persobara de la Arte e (c. e. e).	Date of Receipt
City	State Zip Code M! 49234	Transaction ID : SA11AI.4159 Amount of Each Receipt this Period
Name of Employer Receipt For: Primary General Other (specify)	Coupation ogregate Year-to-Date ▼ 1500,00	1500.00
Full Name (Last, First, Middle Initial) C.		Date of Receipt
Malling Address City	State Zip Code	Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.		Amount of Each Notes to this Period
Davids Far	ggregate Year-to-Date ▼	
SUBTOTAL of Receipts This Page (optional) TOTAL This Period (last page this line number only)		26500.00 265

Exhibit C

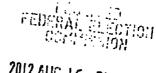
24/48 HOUR NOTICE OF INDEPENDENT EXPENDITURES

SCHEDULE E)	PAGE 1 OF 1 FOR SE OF FORM 24/48			
NAME OF COMMITTE (In Full) Prosperity For Michigan	FEC IDENTIFICATION NUMBER ▼ C C00518357			
Check If 24-hour report 48-hour report New report Amends report	t filed on			
Full Name (Lest, First, Middle Initial) of Payee Media Ad Ventures	Date 07 21 2012			
Mailing Address 816 Old Keene Mills Rd Suite A300	Amount			
City State Zip Code Springfield VA 22152	275000.00			
Purpose of Expenditure Tv Ad Category/ Type	Office Sought: House State: MI Senate District:			
Name of Federal Candidate Supported or Opposed by Expenditure: CLARK DURANT	Check One: Support Oppose			
Catendar Year-To-Date Per Election 275000.00	Oisbursement For: Primary General 2012 Other (epecify)			
Full Name (Last, First, Middle Initial) of Payee Sterling Consulting	Date 07 21 2012			
Malling Address 112 E. Allegan Suite 700	Amount			
City State Zip Code Lansing Mi 48933	13628.00 Transaction ID : SE.4170			
Purpose of Expenditure Management and Strategy Category/ Type	Office Sought: House State: Mi Senate District: President			
Name of Federal Candidate Supported or Opposed by Expenditure: CLARK DURANT	Check One: Support Oppose			
Calendar Year-To-Date Per Election 288628.00	Disbursement For: Primary Ganeral Other (specify)			
(a) SUBTOTAL of Itemized Independent Expenditures	288628.00			
(b) SUBTOTAL of Unitemized Independent Expenditures				
(c) TOTAL Independent Expenditures	288628.00			
Under penalty of perjury I certify that the ladependent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.				
JENNIFER SATTERLEE Electronically Filed Date	07 23 2012			
Signature	Bergalian Despitation for the control of the control of			

Prosperity for Michigan

201 Townsend Ste. 923, Lansing, MI 48933 Phone: 517-374-9168 Email: jen.satterlea12@gmail.com

Statement by Jen Satterlee, Treasurer



2012 AUG 16 PH 12: 32

OFFICE OF BEHERAL COUNSEL

August 8, 2012

MUR 6613

Anthony Herman General Counsel Federal Election Commission 999 E. Street, NW Washington, DC 20463

Re: In response to complaint received by the FEC from Charles R. Spies of

Clark Hill about Prosperity for Michigan ("Committee") (FEC ID#:

C00518357)

Dear Mr. Herman:

I have enclosed my Affidavit in response to a letter received by the FEC (dated July 31, 2012) regarding a complaint filed by Charles R. Spies of Clark Hill. I wish for this matter to be made public. Please contact me if you have any questions at 517-374-9168.

Respectfully Submitted,

Jen Satterlee

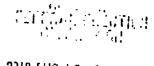
Treasurer, Prosperity for Michigan

Enclosures:

1. Affidavit

STATE OF MICHIGAN)

COUNTY OF INGHAM)



2012 AUG 16 PT: 12: 32

OFFICE OF COURS IN THE L

AFFIDAVIT OF JENNIFER SATTERLEE

Jennifer Satterlee, being duly sworn, deposes and says:

- 1. I am an intern at McLellan Law Offices, 201 Townsend Ste. 926, Lansing, MI 48933. I was asked to serve as treasurer of the Committee and file the required reports.
- 2. Prosperity for Michigan is an independent expenditure only committee (a/k/a a "SuperPAC") as described in paragraph 4 at http://www.fec.gov/ans/answers_pac.shtml.
- 3. The Committee was registered with the Federal Election Commission ("FEC") in April 2012.
- 4. Since inception, I have filed on behalf of the Committee:
 - a. Statement of Organization was filed with FEC. Committee became official on April 6, 2012.
 - b. Amended Statement of Organization to change name of bank and add designated agent as assistant treasurer.
 - c. July Quarterly on July 13, 2012 (from April to June 30). No expenditures had been made and none was reported. No receipts were reported, but the Committee had received \$188.500.
 - d. Amendment to July Quarterly on July 23 filed, after talking with FEC representative. \$188,500 in receipts was reported 8 days late. This was an error en my part beceuse I thought since the Committee is an independent expenditure only committee, that I had to report independent expenditures only. While I was on the phone with the Committee's FEC analyst, Sarah (last name unknown), getting help with my first independent expenditure 48 hour report, I asked what the disbursements and receipts tab meant in the FEC online system, and she told me it was for contributors. Not realizing I had to report the contributers, I asked her what I could do to fix my previous report and sdd them to it. Then she walked me through how to file the amendment so the report could reflect the contributions I hadn't reported on the previous Quarterly report.
 - e. 48 Hour Notice of independent expenditures filed on July 23, 2012. \$288,628 total including:
 - i. \$275,000 to Media Ad Ventures for TV ads.
 - ii. \$13,628 to Sterling Consulting for "management and strategy."
 - f. 48 Hour Notice of Independent Expenditures filed on July 24, 2012. \$125,000 to Media Ad Ventures for TV ads. I realized after re-reading my literature carefully about filing requirements, that I should not have marked the 48 hour report box because left unchecked, the report is automatically a 24 hour report. My

- subsequent reports have all been 24 hour since the two initial independent expenditure reports.
- g. 12 day pre-primary report filed on July 26. (I asked Sarah, the Committee's FEC analyst about what to put for people who still hadn't sent their occupation/employer info, and she said to put in the report info requested, and then to file an amendment when I get everyone's information. I have requested employer and occupation information from all the contributors and am still waiting to get everyone's information so I can file just one amendment).
- h. 24 hour report filed July 26 totaling \$12,609.44
 - i. \$396 to Grosse Pointe News for advertising
 - ii. \$4500 to Combat Data for advertising
 - iii. \$3,788.44 to Litho Printing Service for printing
 - iv. \$3,925 to Marketing Dialogue for telemarketing
- i. 24 hour report filed July 27 totaling \$40,000
 - i. \$40,000 to Media Ad Ventures for TV ad
- j. 24 hour report filed July 30 totaling \$36,960.17
 - i. \$1,960.17 to Independent News Papers for advertising
 - ii. \$35,000 to Media Ad Ventures for TV ad
- k. 24 hour report filed July 31 totaling \$105,027.17
 - i. \$92,000 to Media Ad Ventures for TV ad
 - ii. \$13,027 to Alfano Communications for TV ad
- 1. 24 hour report filed August 6 totaling \$ 17,132.62
 - i. \$15,000 to Media Ad Ventures for TV ad
 - ii. \$2132.62 to Alfano Communications for TV ad
- 5. The Commission states that:

The date that a communication is publicly disseminated serves as the date the expenditure is "made."

Both of the two 48 hour reports were filed within the 24 hour period required for notice of Independent Expenditures. The TV ad ran on July 23, and the two 48 hour reports were filed with the FEC on July 23 and July 24.

6. I never knowingly filed false and misleading reports with the Commission for purposes of concealing the identity of the Committee's donors. There was never any attempt or intention on my part to disguise any information from the public regarding donors' identities or any information of any kind.

I did not deliberately make any of the mistakes I made during my first attempts at filing the Committee's reports with the FEC. This can be evidenced by my frequent phone calls to the Committee's FEC analyst, Sarah (last name unknown), for help and questions.

I have made my best effort to maintain proper record keeping with the FEC on behalf of Prosperity for Michigan.

7. To the best of my knowledge there has never been any kind of coordination between Prosperity for Michigan and "The American Way", Clark Durant's official campaign.

Further affiant saith not.

JENNIFER SATTERLEE

Subscribed and sworn to before me this Aday of August 2012.

Notary Public

ANGELA WALTZ

NOTARY PUBLIC, STATE OF MI
COUNTY OF EATON

MY COMMISSION EXPIRES Jan 4, 2015

ACTING IN COUNTY OF I NO H A IN